



Feedback form

Draft guideline: A guide to preparing revegetation plans for clearing permits under Part V of the *Environmental Protection Act 1986*

Respondent information

Company or association represented by this submission

Private – representing two individuals

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Why are you/your business or association interested in the draft guideline titled ‘A guide to preparing revegetation plan for clearing permits under Part V of the *Environmental Protection Act 1986*’?

Lyn and Floora have experience writing and implementing these plans. We therefore want the guide to be a robust document that specifically lists what is required. A good quality document will improve the quality of the revegetation plan outcomes. Improve consistency between DPaW, EPA and DER documents. At the moment there is contradictory guidance.

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Feedback on the draft guideline: A guide to preparing revegetation plans for clearing permits

Are there any parts of the draft guideline where the requirements are not clear? Please outline in the text box below, indicating the page, section number and title for each part being referred to.

It is not clear why the Flora Survey Technical Guide (EPA & DPaW, 2015) document is not referred to anywhere.

It is not clear why flora survey methods are detailed in this document, rather than referred to Guidance Statement 51 and Technical Flora survey guides considering all surveys should be undertaken by specialist consultants familiar with these documents.

Please provide other comments or suggestions in the text box below, indicating the page, section number and title for each part being referred to.

Document Section	Comment
Definitions "Disease Interpreter"	Disease interpreter does not stipulate a DPaW qualified disease interpreter?
5.2.1	Require data to be sent to DER on CD-ROM. Can this not be emailed electronically? Reduce our environmental footprint?
5.3.1 Selecting reference sites	Gibson <i>et al.</i> (1994) and Keighery <i>et al.</i> (2012) are not considered suitable "reference site" datasets to develop project specific completion criteria. These datasets represent multiple data collection events over a long period of time. These established datasets are unlikely to be comparable. Should reference sites not be relevant to project in terms of vegetation condition?
5.3.2	This section should reference survey methods in accordance with GS51 and EPA & DPaW Flora Survey Technical Guide. This ensures consistency in survey methods and avoids republishing standards that have already been published. Perhaps this section should stipulate the <i>difference</i> between published standards and additional requirements required (i.e. stems/ha data) needed to inform the revegetation plan.
5.3.2 table 1	Why does it state "minimum requirements"?
	Density of trees and large shrubs based on stems/ha is not data collected during flora and vegetation surveys. Should this data be collected? If so, proponent needs to be aware to clearly stipulate this in RFTs to obtain correct data from consultants.
	Vegetation structure description should align with current standards using NVIS to Sub-association level (ESCAVI, 2003).
	Vegetation condition should align with Flora Technical Guide (EPA & DPaW, 2015)

	No mention of quadrat size
	Species richness measure – do they want this per quadrat, per veg community, or in total? And how would this relate back to the revegetation plan?
	Disease mapping not relevant in all regions
5.3.3	This section should reference GS51 and EPA & DPaW Technical Guide
5.3.4	Quadrats must be placed in vegetation in excellent or very good condition. What if the project area is very degraded? If the area is degraded does the revegetation plan have higher goal posts for post-rehabilitation?
	Quadrats must include common species and those endemic to an ecosystem, see DPaW website. Where on DPaW website is this information? Species 'endemic to an area' I would assume as all native species?
5.4.1 table 2	Discusses completion criteria in terms of stems/ha or stems/quadrat. Need to consider how this data is collected during baseline surveys.
5.7 table 4	Why does the cost have to be shown at this stage?
6.1.1 table 5	Same responses as for table 1. Why is this repeated rather than stating that revegetation monitoring should be as per baseline studies.
	Weed mapping "as appropriate", differs from table 1, why?
7.0	Should include EPA & DPaW flora survey technical guide